

CAMERON & GOUGER

AN ASSOCIATION OF ATTORNEYS

28 COURTHOUSE SQUARE - SUITE 100

P. O. BOX 759

JASPER, TENNESSEE 37347

TELEPHONE 423-942-9975
FACSIMILE 423-942-4473

J. HARVEY CAMERON, P.C.
jhcaml@aol.com

WILLIAM L. GOUGER, JR., P.C.

JOHN H. "CAM" CAMERON, JR.
camlawof@earthlink.net

July 31, 2007

RECEIVED

AUG 1 2007

Enforcement/Compliance

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Paul E. Davis, Director
Division of Water Pollution Control
Tennessee Department of Environment
and Conservation
6th Floor Ellen C. Annex
401 Church Street
Nashville, TN 37243

RE: Dean Lay Funeral Home and Dean Lay
Case No.: WPC07-0130

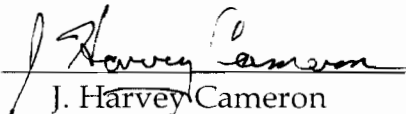
Dear Mr. Davis:

I am enclosing a Petition of Dean Lay Funeral Home and Dean Lay for Review of Order and Assessment in the above captioned action. By copy of this letter, I am sending a copy to Mr. Mark Jordan with the Department of Environment and Conservation.

With best personal regards, I am

Yours truly,

CAMERON & GOUGER

By: 
J. Harvey Cameron

JHC/clt

Enclosures

cc: Mr. Mark Jordan
Mr. Dean Lay

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

IN THE MATTER OF:

* DIVISION OF WATER
* POLLUTION CONTROL

DEAN LAY FUNERAL HOME AND
DEAN LAY

*
*
*

Respondents

* CASE NO.: WPC 07-0130

**PETITION OF DEAN LAY FUNERAL HOME AND DEAN LAY FOR REVIEW OF
ORDER AND ASSESSMENT**

Comes the Respondents, **DEAN LAY FUNERAL HOME AND DEAN LAY**, and file this Petition for Review of the Order and Assessment dated July 6, 2007, and would show as follows:

I

Respondents deny that they failed to obtain permit coverage as required by the provisions of T.C.A. §69-3-108(b) and 114(b). They affirmatively state that under the requirements for obtaining storm water discharge permit associated with the construction activities, the Respondents would show that the area disturbed was less one (1) acre of total land area nor that the construction activities at the site were part of a larger common plan of development of at least one (1) acre in size.

II

The Respondents also deny that they are in violation of any other provisions which would require a construction general permit.

III

Your Respondents would show that they have placed the necessary silt fences to

prevent any sediment from leaving the site and that there is no discharge of any storm water which would affect the waters of the State of Tennessee.

WHEREFORE, the Respondents pray that a hearing before the Tennessee Water Quality Control Board be granted and that the Order and Assessment be vacated and that they be discharged from any and all liabilities and responsibilities.

Respectfully submitted,

CAMERON & GOUGER
An Association of Attorneys
28 Courthouse Sq., Suite 100
P. O. Box 759
Jasper, TN 37347
(423) 942-9975

By: J. Harvey Cameron
J. Harvey Cameron, **BPR#2465**
Attorney for the Respondent

CERTIFICATE OF SERVICE

I, J. Harvey Cameron, do hereby certify that I have served the a copy of the foregoing to:

Mr. Mark Jordan
Department of Environment and Conservation
Division of Water Pollution Control
401 Church Street
L & C Annex 6th Floor
Nashville, TN 37243-1634

by hand-delivery or by mailing a copy of same by United States mail with postage prepaid thereon this the 31st day of July, 2007.

By: J. Harvey Cameron
J. Harvey Cameron